

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IVETTE M. MARTÍNEZ GONZÁLEZ, ET AL.,
Plaintiffs

vs.

CATHOLIC SCHOOLS OF THE
ARCHDIOCESES OF SAN JUAN PENSION
PLAN, ET AL.,
Defendants

CIVIL No. 16-2077 (GAG)

NORMA CARDOZA ESTREMERA, ET AL.,
Plaintiffs

CIVIL NO. 16-2318

vs.

COLEGIO PADRE BERRIOS, ET AL.,
Defendants

**MOTION FOR EXTENSION OF TIME TO FILE A DISPOSITIVE
MOTION AS TO THE CHURCH PLAN EXEMPTION**

TO THE HONORABLE COURT:

COMES NOW Plaintiffs Norma Cardoza and Candida Perez, through the undersigned
counsel, and very respectfully state and pray as follows:

1. On March 30, 2017, this Honorable Court entered an *Order* indicating that the deadline
to file dispositive motions as to the Church Plan Exemption was set for November 20, 2017. *See,*

Docket No. 113.

2. Notwithstanding this attorney efforts to comply with this schedule once the case
consolidated, it was impossible to complete and file such motion within the period of time
scheduled by the Court.

3. Therefore, Plaintiffs request an extension of time of thirty (30) days, until December 20,
2017, to file a dispositive motion as to the Church Plan Exemption in this case.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court that for the reason stated here above grants the extension of time of thirty (30) days, until December 20, 2017.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th of November of 2017.

IT IS HEREBY CERTIFIED that on this same date a true and exact copy of the foregoing was filed electronically with the Clerk of the Court via the CM/ECF system, which will send notification of such filing to all attorneys of record.

s/ Luis Vivaldi Oliver
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